

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ANGELEA VAN DAM,

Plaintiff,

v.

PLANCHOLO, *et al.*,

Defendants.

Civil Action No. 25-cv-1198

Judge Bissoon

MOTION FOR PRELIMINARY INJUNCTION

In connection with this Court’s September 12, 2025 Order, Plaintiff now moves this Court for an Order granting the Motion for a Preliminary Injunction against the Defendants identified on **Schedule “A”** to the Complaint and attached hereto (collectively, the “Defendants”). The legal support for this motion is contained in the Memorandum of Law. The evidence supporting this motion is contained in the Declarations of Angelea Van Dam, Stanley D. Ference III, and Dee Odell, and the exhibits attached thereto. A proposed Order affirmatively granting the relief sought herein is filed herewith.

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Respectfully submitted,

Dated: September 23, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

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